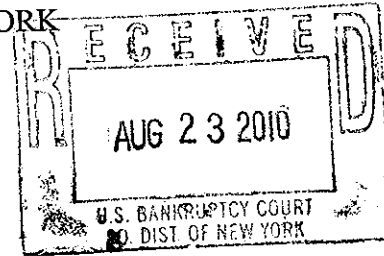


UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK



IN RE:

MOTORS LIQUIDATION COMPANY)
f/k/a GENERAL MOTORS)
CORPORATION, et al.)

Debtor)

Case No. 09-50026 (REG)
Chapter 11

MOTION FOR RELIEF FROM STAY

Comes now Timothy Bynum, by counsel, John F. Townsend, III, and would move the Court to be granted relief from the automatic stay imposed under 11 U.S.C. 362(a), and in support of said motion states as follows:

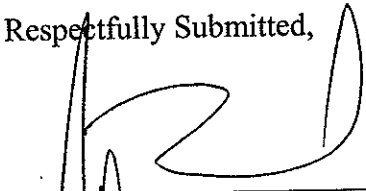
1. Debtor filed for protection under Chapter 11 of the United States Bankruptcy Code.
2. Timothy Bynum is listed as an unsecured creditor in said bankruptcy schedules filed by the Debtor.
3. The nature of the claim of Timothy Bynum revolves around toxic exposure on GM property.
4. Suit was filed in the Marion County, Indiana Superior Court on September 25, 2008 under Cause No. 49D12-0809-CT-43673.
5. At the time of the accident, the Debtor was insured through a policy of liability insurance issued to a co-defendant, Adamo Demolition Company, which policy is providing the Debtor with a defense to the tort lawsuit.
6. Under I.C.27-13-7, the insolvency of an insured does not relieve the liability carrier of its obligation for payment of damages for injuries sustained or losses occasioned during the life of the policy.

7. Timothy Bynum understands that should a discharge be granted to Debtor, he will not be able to pursue any excess or deficiency judgment, over and above the policy limits of the insurance policy issued to Adamo Demolition Company directly against the Debtor.

8. Timothy Bynum also understands that any judgment obtained would be limited to the policy proceeds that are available from the insurance policy.

WHEREFORE the creditor, Timothy Bynum, by counsel, John F. Townsend, III, respectfully requests this Court lift the Automatic Stay as it applies to the pending lawsuit in the Marion County, Indiana Superior Court, under Cause NO. 49D12-0809-CT-43673; that Timothy Bynum be allowed to pursue a judgment as to the policy proceeds available to Debtor through its liability policy through Adamo Demolition Company and for all other relief just and proper in the premises.

Respectfully Submitted,



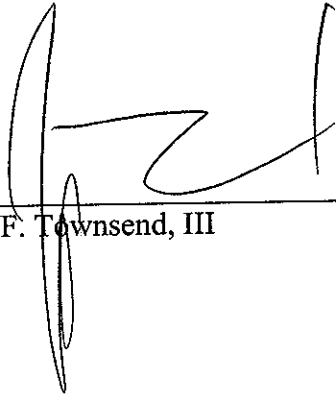
John F. Townsend, III #19600-49
TOWNSEND & TOWNSEND
230 E. Ohio Street
Indianapolis, IN 46204
Townsendlawfirm@sbcglobal.net
(317) 264-4444

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading has been served to the following counsel of record via first class U.S. mail postage, prepaid this 20th day of August, 2010.

Weil, Gotshal & Manges, LLP
767 Fifth Avenue
New York, NY 10153
Attorneys for Debtors and
Debtors in Possession

Office of the U.S. Trustee of the SDNY
Attn: Diana G. Adams
33 Whitehall Street
21st Floor
New York, NY 10004



John F. Townsend, III

TOWNSEND & TOWNSEND
230 East Ohio Street
Indianapolis, IN 46204
(317) 264-4444
(317) 264-2080 fax
townsendlawfirm@sbcglobal.net

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE:

MOTORS LIQUIDATION COMPANY)
f/k/a GENERAL MOTORS)
CORPORATION, et al.)
Debtor)

Case No. 09-50026 (REG)
Chapter 11

ORDER GRANTING RELIEF FROM STAY

This cause came to be heard upon the Motion of Timothy Bynum for Relief from the automatic stay imposed under 11 U.S.C. 362(a). After review of the motion, and after notice is duly given to all interested persons, this Court now finds that the relief requested by Timothy Bynum should be granted.

IT IS THEREFORE ORDERED, ADJUDGED AND DECREED that Timothy Bynum is hereby granted relief from the Automatic Stay imposed under 11 U.S.C. 362(a). Timothy Bynum is hereby authorized to proceed with the pending personal injury suit in the Marion County, Indiana Superior Court under Cause No. 49D12-0809-CT-43673, to the extent of available liability insurance policy limits.

Dated: _____

UNITED STATES BANKRUPTCY JUDGE

Distribution:

John F. Townsend, III
TOWNSEND & TOWNSEND
230 East Ohio Street
Indianapolis, IN 46204

Weil, Gotshal & Manges, LLP
767 Fifth Avenue
New York, NY 10153
Attorneys for Debtors and
Debtors in Possession

Office of the U.S. Trustee of the SDNY
Attn: Diana G. Adams
33 Whitehall Street
21st Floor
New York, NY 10004